

## **REMARKS**

The Examiner is thanked for the review of the present patent application. Claims 1, 9, and 18 have been amended. The amendments are of a clarifying nature and better define that which the Applicants consider to be the invention. The amendments do not add new matter. Claim 12 has been canceled. Claims 1-11 and 13-25 are pending in this application.

### **Rejections under 35 U.S.C. § 102**

Claims 1-5, 8, 18, and 22-24 were rejected under 35 U.S.C. 102(e) as being anticipated by Nally et al. (U.S. Patent No. 6,298,478)(hereinafter "Nally"). This rejection is respectfully traversed. As discussed below, Applicants respectfully submit that Nally does not disclose each and every feature of the claimed invention as required for a section 102 rejection.

With respect to claims 1 and 18, Applicants respectfully submit that at the very least Nally does not disclose or suggest to classify the entity bean object with a particular state management type. The state management type can identify the mechanism and policy for replication of state objects to the different types of state servers and for migration of the state objects to different types of state servers and for migration of the state objects from one server process to another. Applicants respectfully submit that the cited portions of Nally teaches usage of a technique where multiple concurrent and/or nested transactions may access the same EJB's simultaneously but does not disclose classification of the entity bean object with the particular state management type (See Abstract of Nally). Moreover, the cited portions of Nally discuss usage of generic persistent storage but does not disclose particular state management types to which the entity bean object can be classified (See Figures 2, 3, 5, 6A, 6B, 7, 8, and associated text). Consequently, Applicants submit that the transactions

discussed by Nally are particular applications utilizing different versions of the EJB and does not disclose those transactions as being associated with a specific state management type.

In addition, Nally discloses that when an application or application user has made modifications to an EJB version and requests to commit the modifications, a determination is made as to whether committing the modifications will result in an unacceptable data conflict with other versions of the same EJB (See Abstract of Nally). Consequently, Applicants respectfully submit according to Nally, each of the different transactions may have different data that are accessed by different transactions which can thus be different than a persisted version of the EJB. In contrast, claim 1 as amended includes the feature of each one of the plurality of state objects (which stores the state of the entity bean) being replicated in storage corresponding to the state management type and claim 18 as amended include the feature of a replica of each state management unit (where each state object stores a state of a corresponding entity bean object) is maintained in a state server. Applicants respectfully submit that none of the cited prior art references disclose or suggest this feature. Therefore, Applicant respectfully submit that Nally does not disclose or suggest all of the features of the claimed invention.

In addition, Applicants respectfully submit that the dependent claims are allowable for at least the reasons the independent claims are allowable. Applicants therefore respectfully request that the section 102 rejection be withdrawn.

**Rejections under 35 U.S.C. § 103**

Claims 6-7, 9-17, 21, and 25 were rejected under 35 U.S.C. 103(a) as being unpatentable over Nally et al. as applied to claim 1 above, and further in view of Chung et al. (U.S. Patent No. 6,105,148)("Chung"). Claims 16-17 and 19-21 were rejected under 35 U.S.C. 103(a) as being unpatentable over N2 as applied to claim 9, and Nally et al. as applied to claim 18 above, and further in view of Apte et al. (U.S. 6,269,373) ("Apte"). Claim 21 was

rejected under 35 U.S.C. 103(a) as being unpatentable over N3 as applied to claim 20 and further in view of Savage et al. (U.S. Patent No. 6,604,110)("Savage"). Applicants respectfully traverse these rejections. Applicants respectfully submit that, as discussed below, the cited prior art references individually or in combination fail to raise a prima facie case of obviousness against the claimed invention.

With respect to independent claim 9, as discussed below, Applicants respectfully submit that none of the cited prior art discloses or suggests the feature of classifying the entity bean object with a particular state management type or the feature of a replica of each state management unit being maintained in a state server.

With respect to the Nally reference, as discussed above, Applicants respectfully submit that Nally does not disclose or suggest the features of the rejected claims. With reference to claim 9, the discussion with respect to the claims discussed in the section 102 rejection is also applicable here. Therefore, Applicants respectfully submit that Nally does not disclose or suggest all of the features as claimed in claim 9 or the other rejected claims.

With respect to Chung, Applicants respectfully refer the Office to Figure 1 of Chung which shows the system used by Chung which includes a volatile storage space, which stores software code associated with each user application process such as a process that is being executed by the processing unit, and a persistent memory that includes a repository for storing files. (See Column 5, lines 14-36 of Chung) Consequently, Applicants respectfully submit that Chung does not disclose or suggest different types of state management and further that Chung does not disclose or suggest classification of state objects with a particular state management. Moreover, Applicants respectfully submit that Chung does not teach usage of an entity bean object, a state management unit, and a replica of the state management unit in a state server. Therefore, Applicants respectfully submit that Chung individually or in

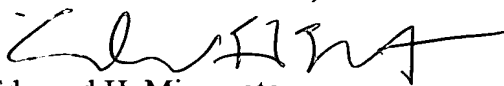
combination with the other cited prior art references do not disclose or suggest all of the features of the claimed invention of the rejected claims.

Additionally, Applicants respectfully submit that the Apte and the Savage references do not remedy the deficiencies as discussed regarding the Nally and Chung references. Consequently, Applicants respectfully submit that the cited prior art references, individually or in combination, do not disclose or suggest all of the features of the claimed inventions as is required for a section 103 rejection. As a result, Applicants respectfully submit that the cited prior art references fail to make a prima facie case of obviousness for independent claim 9 as well as for the other rejected claims.

Applicants respectfully submit that all of the dependent claims are allowable for at least the same reasons as the independent claims are allowable. Consequently, Applicants respectfully request that the section 103 rejection be withdrawn.

In view of the foregoing, Applicants respectfully request reconsideration and reexamination of the pending claims, as amended herein, and submit that these claims are in condition for allowance. Accordingly, a notice of allowance is respectfully requested. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 749-6900 ext. 6927. If any additional fees are due in connection with the filing of this paper, then the Commissioner is authorized to charge such fees to Deposit Account No. 50-0805 (Order No. SUNMP006).

Respectfully submitted,  
MARTINE & PENILLA, L.L.P.

  
Edmund H. Mizumoto  
Reg. No. 46,938

710 Lakeway Drive, Suite 200  
Sunnyvale, California 94085  
(408) 749-6900  
Customer Number 32291